

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

AMIR MUHAMMAD,

Plaintiff,

v.

CITY OF ST. LOUIS

Defendant.

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Cause No. 4:18-cv-01757 RLW

NOTICE OF VOLUNTARILY DISMISSAL WITHOUT PREJUDICE

COMES NOW Plaintiff and, pursuant to Federal Rule of Civil Procedure 41, moves this court to voluntarily dismiss this action without prejudice. In support of this motion, Plaintiff states:

1. Plaintiff filed this instant lawsuit in Missouri state court on August 28, 2018, alleging various counts of employment discrimination under state and federal law, while still employed by the City of St. Louis.

2. Thereafter, Plaintiff was forced to quit his job in November 2018 due to ongoing discrimination and harassment.

3. Plaintiff filed a second Charge of Discrimination on January 22, 2019, based on the events that occurred since the filing of his first Charge of Discrimination and August 28, 2018 lawsuit, including his constructive discharge.

4. Thereafter, Plaintiff, as soon as he was able, requested a Right to Sue from the Missouri Commission on Human Rights so that he could file a lawsuit based on his second Charge in state court.

5. Plaintiff received the Right to Sue on the second charge on September 12, 2019.

6. Plaintiff filed a lawsuit based on this Charge within the 90 days required under Missouri law, on December 10, 2019, in Missouri State Court.

7. This lawsuit is currently pending in the City of St. Louis Circuit Court, Cause No. 1922-CC12201.

8. Plaintiff is going to proceed forward with the second filed lawsuit, based on his constructive discharge.

9. Plaintiff wishes to voluntarily dismiss this lawsuit.

WHEREFORE, Plaintiff respectfully requests that this Court enter its Order dismissing this lawsuit without prejudice.

Respectfully submitted,

PONDER ZIMMERMANN LLC

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was served this 14th day of January, 2020, by electronic service, to:

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/s/ Jaclyn Zimmermann